

December 13, 2024

Adam Saul
Air Quality Planner
Washington State Department of Ecology
300 Desmond Dr SE, Lacey, WA 98503

Re: Zeem Solutions' Comments on Draft Clean Fuel Standard Rule Language Changes

Zeem Solutions (Zeem) appreciates the opportunity to comment on the proposed changes to Washington's Clean Fuel Standard (CFS) Language and applauds staff's attention to detail and stakeholder engagement to date. As a nascent industry, the economics of zero emission freight are more expensive than diesel, and the CFS program is one of the few that helps to close the gap and support a transition. These changes, particularly the creation of the HD-FCI program, will drive the deployment of infrastructure and affordable charging for commercial fleets in Washington.

Zeem is building a 2-acre site in SeaTac, WA which will have 42 fast DC fast charging (DCFC) ports and a 7.5 MW interconnection capable of servicing approximately 250 Class 8 vehicles daily. This site is expected to launch phase one operations in 2025 and will principally serve drayage fleets who call the ports of Seattle and Tacoma among other local fleet use cases.

Zeem has a track record of success in the commercial fleet charging infrastructure space with our flagship depot adjacent to LAX airport, which is home to 78 DCFC, 53 AC ports, and a 7.5 MW interconnection. We participate in CA's Low Carbon Fuel Standard (LCFS) program, an analog to WA's CFS program, which has been transformative for supporting the electrification of commercial fleets. At this site in Inglewood, CA we have dispensed over 5 million kWh of electricity year to date and are performing almost 1,000 charge sessions per day. Our depots are located near seaports, airports, inland ports, warehousing & distribution, and population centers. The customer base and vehicle composition are representative of the market as well as the transportation asset that the depot is located near. For example, our LAX-adjacent depot serves a diverse mix of customers including rideshare, rental, air freight, passenger shuttles, public fleets, and Class 8 fleets. In addition to our upcoming site in WA, we have drayage-focused depots coming online in Long Beach, CA, Newark, NJ, and at ports across the country.

Zeem operates **shared charging**¹ depots with controlled access that are open to multiple fleets so we appreciate the recognition of this innovative approach which the CFS program defines as: "site will be available on a continual basis to at least two third-party heavy-duty EV fleets under separate ownership and control."

When considering **payment method requirements**, we urge staff to allow flexibility for shared sites. Zeem employs depot technicians who operate chargers, are trained in the maintenance of equipment and vehicles, and staff the sites around the clock. When a fleet driver arrives at our depot, these technicians greet drivers at the entrance and charge the vehicles while drivers wait in the lounge or return home and pick up their fully charged vehicle during the start of their next duty cycle. Because Zeem-owned shared charging facilities are operated by on-site staff and

¹ <https://calstart.org/shared-charging/>

not self-service, point-of-sale payment requirements on each charger are unnecessary and will only serve to drive up overall costs to deploy needed infrastructure.

The transition to zero-emissions fleets is happening now and companies like Zeem are providing the critical infrastructure to realize the promise of how a decarbonized transportation sector will benefit communities, especially those that are overly burdened by harmful emissions. We applaud the leadership shown by the state of Washington and the Department of Ecology in supporting this transition through these proposed amendments to the CFS program.

Sincerely,

Daniel Schweizer
Policy & Regulatory
Zeem Solutions, Inc.
dschweizer@zeemsolutions.com
Phone: 619-817-1274